

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA, *ex rel.*  
JULIE LONG,

*Plaintiffs,*

v.

JANSSEN BIOTECH, INC.,

*Defendant.*

Civil Action No. 16-CV-12182-FDS

**MEMORANDUM OF LAW IN SUPPORT OF JOINT MOTION  
FOR EXTENSION OF PHASE ONE EXPERT DEADLINES**

Plaintiff-Relator Julie Long (“Relator”) and Defendant Janssen Biotech, Inc. (“Janssen”) jointly request a modest extension of a few weeks to the deadlines for Phase One expert discovery to allow for thorough and complete preparation and testing of expert opinions.

On July 7, 2025, Relator disclosed five experts that she may use at trial to present evidence and provided each expert’s written report. The current expert discovery schedule requires Janssen to designate experts by September 22, 2025, Relator to designate rebuttal experts by November 6, 2025, and all expert depositions to be completed by January 6, 2026. ECF No. 473.

In an effort to move the matter forward in an efficient manner, the parties have conferred and jointly propose slight modifications to the existing expert discovery schedule that aim to address the amount of time necessary to respond to Relator’s experts, to accommodate the anticipated number of depositions (likely 10–12), and to mitigate anticipated scheduling difficulties for counsel and the experts around the holidays. Specifically, the parties jointly request that the deadlines be extended by approximately three weeks in total, as follows:

- Janssen shall designate experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) by **Monday, October 6, 2025**.
- Relator shall designate rebuttal experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) by **Wednesday, November 26, 2025**.
- Any experts disclosed by Relator and Janssen shall be deposed by **January 30, 2026**.

It is axiomatic that this Court “has broad discretion to allow motions to extend deadlines” upon a showing of good cause for the requested extension. *Gouin v. Nolan Assocs., LLC*, 325 F.R.D. 521, 524 (D. Mass. 2017); *see also* Fed. R. Civ. P. 16(b)(4). There is good cause to extend the deadlines here. The parties agree that the requested extension of the expert discovery deadlines will enable them to more effectively prepare and test the expert opinions that will be presented to the Court and the jury, and to avoid scheduling issues around the holidays. Further, the modest extension will not prejudice any party or affect any other deadlines set by the Court.

### **CONCLUSION**

For the foregoing reasons, the parties respectfully request that the Court extend the deadlines for Phase One expert disclosures and discovery pursuant to the proposed schedule above.

Dated: August 15, 2025

/s/ Jason C. Raofield

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**CERTIFICATE OF SERVICE**

I hereby certify on this 15th day of August, 2025, that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Jason C. Raofield

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